

The Honorable Thomas S. Zilly

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

DONALD E. MacCORD, JR.,  
SHANNON D. DOYLE, and  
DIGI OUTDOOR MEDIA, INC.

Defendants.

Case No. 2:17-cv-1809

**FURTHER JOINT  
STATUS REPORT**

Counsel for the Securities and Exchange Commission (the “Commission”), Mr. Doyle, and Digi Outdoor Media, Inc. met and conferred on September 26 and September 27, 2019. The conferring parties were unable to contact Mr. MacCord, who is currently serving time in federal prison, and thus the conferring parties submit the following Joint Status Report:

1. *Defendants MacCord and Doyle Pleaded Guilty but Doyle Has Not Been Sentenced*

Mr. MacCord and Mr. Doyle entered guilty pleas in the related matter captioned *United States v. Donald MacCord and Shannon Doyle*, No. 17-cr-592-WHA (N.D. Cal. filed Nov. 28, 2017) (the “Criminal Action”). The Court in the Criminal Action entered judgment against Mr. MacCord and ordered him to surrender on July 1, 2019 to begin serving a 30 month sentence. The date for Mr. Doyle’s sentencing has been scheduled for November 19, 2019.

2. *Defendant MacCord is Currently Unrepresented*

The Court granted a motion by Mr. MacCord’s former counsel to withdraw. *See* Minute Order (ECF 37) (Feb. 14, 2019). To date, Mr. MacCord has not retained representation in this matter. Counsel for the Commission will serve this status report on Mr. MacCord at the federal prison in Montgomery, Alabama where he is serving his sentence.

3. *The Conferring Parties’ Joint Recommendation*

The conferring parties agreed to discuss resolution of the Commission’s claims in light of Mr. MacCord sentence and Mr. Doyle’s plea. The conferring parties further agreed the current stay of discovery would be beneficial and conducive to a negotiated settlement among all parties. Should negotiations not result in a resolution, the Commission would update the Court on the effect of Mr. MacCord’s and Mr. Doyle’s pleas and the final judgments entered against them in the Criminal Action.

The conferring parties therefore request that the Court extend the stay of discovery

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1 through January 27, 2020, to allow time for the submission of a negotiated resolution.

2 Dated: September 30, 2019

Respectfully submitted,

3 /s/ Susan F. LaMarca

4 Susan F. LaMarca

*Conditionally Admitted Pursuant to LCR 83.1(c)(2)*

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9 SECURITIES AND EXCHANGE COMMISSION

10 /s/ Steven W. Fogg

11 /s/ Todd T. Williams

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Attorneys for Defendant

24 DIGI OUTDOOR MEDIA, INC.

**Certificate of Service**

I, Horace Austin, hereby certify that on September 30, 2019, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record.

In addition, I caused the foregoing to be sent by mail, postage pre-paid, to the following:

**Donald MacCord, Register Number: 48702-086**  
FPC Montgomery  
Federal Prison Camp  
Maxwell Air Force Base  
Montgomery, Al 36112

and I caused the foregoing to be sent by email to the following:

Donald MacCord  
c/o Mark Goldrosen, Esq.  
markgoldro@aol.com  
Counsel for Defendant  
United States v. Donald MacCord and Shannon Doyle,  
No. 17-cr-592-WHA (N.D. Cal. filed Nov. 28, 2017)

Dated: September 30, 2019

/s/ Horace Austin  
Horace Austin